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July 9, 2025

**Via ECF**

Hon. Ronnie Abrams  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

**Re: *Antoinette Grant v. NYU Langone Hospitals***  
**Case No.: 1:25-cv-03455 (RA)**  
**Request for Extension of Time to Answer or Move and Other Deadlines**

Dear Judge Abrams:

We represent Defendant, NYU Langone Hospitals (“NYU”), in the above-referenced action and write jointly with Plaintiff’s counsel.

Pursuant to Rule 1(D) of Your Honor's Individual Rules and Practices in Civil Cases, we write to respectfully request a 2-week extension of time for NYU to answer, move, or otherwise respond to Plaintiff’s Complaint, from July 11, 2025, to and including July 25, 2025.

The parties also respectfully request that the deadlines provided in the Court’s Order dated May 29, 2025 (the “Court’s Order”), be extended (Dkt. No. 14.) as follows:

- The last day for the parties to meet and confer regarding settlement be extended from July 31, 2025, to and including August 14, 2025; and
- The parties’ deadline to file a joint letter be extended from August 15, 2025, to and including August 29, 2025.

This is NYU’s second request for an extension of time to respond to the Complaint and the parties’ second request to extend the deadlines in the Court’s Order. This request is necessitated because Defendant’s counsel has been unable to speak with necessary witnesses in connection with preparing a response to the Complaint due to the need to focus their attention to deadlines in the Second Circuit, which were unexpected. Thus, this Firm needs additional time to review documents and obtain additional information from NYU in order to properly respond to the Complaint. This would also provide a better basis for all parties to have meaningful settlement conversations. This Firm has also requested a demand from Plaintiff’s counsel in advance of the meet and confer.

Hon. Ronnie Abrams

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We thank the Court for its time and consideration.

Respectfully submitted,  
**TARTER KRINSKY & DROGIN LLP**

By: /s/ Richard L. Steer  
Richard L. Steer

cc: All counsel of record via ECF.